

# EXHIBIT F

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AiPi, LLC

Movant,

v.

Netflix Inc.,

Respondent.

Case No. 1:24-mc-00002 (LMB/WEF)

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**NOTICE TO COURT RE ORDER (ECF NO. 65)**

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AiPi, LLC (“AiPi”) hereby notifies the Court that it received the objection attached here as Exhibit 1 from Lauri Valjakka. Mr. Valjakka is the Plaintiff in the lawsuit pending in the Northern District of California, *Lauri Valjakka v. Netflix Inc.*, Case No. 4:22-cv-01490-JST (“Netflix Litigation”), in which Netflix issued the subpoena at issue in this miscellaneous case.

Pursuant to Paragraph 2(d) of the Order entered January 27, 2025 (ECF No. 65), AiPi reviewed responsive information it received from the forensic discovery vendor and then provided those documents over which Mr. Valjakka may have a claim of privilege to Mr. Valjakka’s Finnish lawyer, Onni Hietalahti, and his prior lawyer in the Netflix Litigation, William Ramey. The documents were provided to Mr. Valjakka’s lawyers in three batches. The first batch was produced on February 25, 2025, the second batch on March 4, 2025, and the third batch on March 5, 2025. A copy of this Court’s Order (ECF No. 65) accompanied each production.

On March 12, 2025, undersigned counsel received the objection attached here as Exhibit 1 from Mr. Ramey sent on behalf of Mr. Valjakka. Undersigned counsel informed Mr. Ramey that Mr. Valjakka was required to file his objection in accordance with this Court’s Order. Mr. Ramey

Dated: March 12, 2025

/s/ Brendan J. Klaproth  
Brendan J. Klaproth  
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*Counsel for AiPi, LLC*

I hereby certify that on this March 12, 2025, I caused to be served a true and correct copy of the foregoing Notice and supporting documents through the court's electronic filing system on counsel of record for all parties in this case.

/s/ Brendan J. Klaproth

Lauri Valjakka (**acting pro-se**)  
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AiPi, LLC,

Movant,

v.

NETFLIX, INC.,

Respondent.

Viv. Action No. 1:24mc2 (LMB/WEF)

**LAURI VALJAKKA'S OBJECTION  
TO PRODUCTION AND  
DISCLOSURE OF DOCUMENTS  
UNDER COURT ORDER 24<sup>TH</sup>  
JANUARY 2025**

In response to the order of the court to produce and disclose to Netflix documents obtained through forensic discovery and imaging of all AiPi electronic devices from June 2021, I Lauri Valjakka, object to disclosure of any such information or documents.

From the very beginning of my dealings with AiPi I have considered the firm and all its legal staff to be my legal representatives in the matter. I have received the documents accessed through

forensic discovery in two separate patches on March 4th 2025 and March 6th 2025. I have thereafter reviewed the documents and concluded that they consist solely of correspondence between myself and AiPi representatives, primarily with Eric Morehouse, whom I have trusted to be my attorney. Therefore, I consider that all documents being produced under the court order are protected by client-attorney privilege.

Dated: March 11, 2025



**LAURI VALJAKKA**